

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.

Plaintiff,

vs.

LM ERICSSON TELEPHONE COMPANY
(TELEFONAKTIEBOLAGET LM ERICSSON)

QUALCOMM, INC.

ALCATEL-LUCENT USA, INC.

THIRD GENERATION PARTNERSHIP
PROJECT A/K/A 3GPP

and

EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE

Defendants.

Case No. 2:11-cv-4574-RK

**JOINT MOTION OF DEFENDANTS QUALCOMM,
ERICSSON AND ALCATEL-LUCENT TO DISMISS THE
AMENDED COMPLAINT OF TRUEPOSITION, INC.**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendants

Qualcomm, Inc., LM Ericsson Telephone Co. and Alcatel-Lucent USA, Inc. hereby move the Court to dismiss with prejudice plaintiff TruePosition, Inc.'s Amended Complaint as against Qualcomm, Ericsson and Alcatel-Lucent. The grounds for this Motion are set forth in the accompanying Memorandum of Law in Support, and other supporting documents.

Oral argument is respectfully requested.

WHEREFORE, defendants Qualcomm, Ericsson and Alcatel-Lucent respectfully request that the Court grant this Motion and dismiss with prejudice this action as against them pursuant to Federal Rule of Civil Procedure 12(b)(6).

Respectfully submitted,

Dated: March 16, 2012

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